

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

ANDREA FAIN,

Plaintiff,

v.

COMMISSIONER OF SOCIAL
SECURITY,

Defendant.

Case No. C24-5622-MLP

MINUTE ORDER

The following Minute Order is made at the direction of the Court, the Hon. Michelle L. Peterson, United States Magistrate Judge:

The Court previously directed the parties to file supplemental briefing addressing the impact of the Ninth Circuit's decision in *Hudnall v. Dudek*, 2025 WL 729701, at *3 (9th Cir. Mar. 7, 2025), on the ALJ's consideration of lay witness testimony. (Dkt. # 22.) Plaintiff timely filed a supplemental brief on March 17, 2025 (dkt. # 23), and Defendant timely filed a supplemental brief on March 24, 2025 (dkt. # 24).

Plaintiff now seeks leave to "file today or upon order of the court a five-page supplemental reply brief that analyzes SSR 16-3p and explains why this ruling explicitly requires an ALJ to articulate how they are evaluating lay evidence." (Dkt. # 25.)

1 The Court finds that this additional supplemental briefing would be beneficial in this
2 case. Accordingly, **on or before March 27, 2025**, Plaintiff is ORDERED to file a supplemental
3 brief, **no longer than five pages**, addressing the relationship between SSR 16-3p and the ALJ's
4 duty to consider lay evidence.

5 The Clerk is directed to note this matter on the Court's calendar for March 27, 2025.

6 Dated this 26th day of March, 2025.

7 Ravi Subramanian
8 Clerk of Court

9 By: Tim Farrell
Deputy Clerk